

In the District Court of Douglas County, Kansas
Judicial & Law Enforcement Center
Lawrence, Kansas 66044

For Court Use Only

DOUGLAS COUNTY
DISTRICT COURT

2012 JUN 13 1:06

BY _____

STATE OF KANSAS,

Plaintiff,

vs.

DEBORAH MARTHA GOMEZ,
111 N Wolf Rd, North Lake, IL 60161

Defendant.

2-12-7806

Case No. 2012CR0547
DOUGLAS COUNTY, KANSAS

PROBABLE CAUSE INFORMATION

Amy McGowan, Assistant District Attorney, of lawful age, being first duly sworn on oath, for complaint against the above shown defendant, alleges and states:

Count 1

That on or about the 13th day of June, 2012, in Douglas County, Kansas, one Deborah Martha Gomez, did then and there unlawfully, feloniously, and knowingly inflict cruel and inhuman corporal punishment upon any child under the age of 18 years, to-wit: OAG (DOB: 07/06/2004), all in violation of K.S.A. 2011 Supp. 21-5602(a)(3). (Abuse of a Child, Level 5/Person/Felony)

Count 2

That on or about the 13th day of June, 2012, in Douglas County, Kansas, one Deborah Martha Gomez, did then and there unlawfully, feloniously, and knowingly inflict cruel and inhuman corporal punishment upon any child under the age of 18 years, to-wit: TJG (DOB: 06/26/2007), all in violation of K.S.A. 2011 Supp. 21-5602(a)(3). (Abuse of a Child, Level 5/Person/Felony)

Count 3

That on or about the 13th day of June, 2012, in Douglas County, Kansas, one Deborah Martha Gomez, did then and there unlawfully and feloniously and recklessly cause or permit a child under the age of 18 years, to-wit: OAG (DOB: 07/06/2004), to be placed in a situation in which the child's life, body or health may be endangered, all in violation of K.S.A. 2011 Supp. 21-5601(b)(1). (Aggravated endangering a child, Level 9/Person/Felony)

Count 4

That on or about the 13th day of June, 2012, in Douglas County, Kansas, one Deborah Martha Gomez, did then and there unlawfully and feloniously and recklessly cause or permit a child under the age of 18 years, to-wit: TJG (DOB: 06/26/2007), to be placed in a situation in which the child's life, body or health may be endangered, all in violation of K.S.A. 2011 Supp. 21-5601(b)(1). (Aggravated endangering a child, Level 9/Person/Felony)

Count 5

That on or about the 13th day of June, 2012, in Douglas County, Kansas, one Deborah Martha Gomez, did then and there unlawfully and feloniously and recklessly cause or permit a child under the age of 18 years, to-wit: FMG (DOB: 04/14/1998), to be placed in a situation in which the child's life, body or health may be endangered, all in violation of K.S.A. 2011 Supp. 21-5601(b)(1). (Aggravated endangering a child, Level 9/Person/Felony)

Count 6

That on or about the 13th day of June, 2012, in Douglas County, Kansas, one Deborah Martha Gomez, did then and there unlawfully and feloniously and recklessly cause or permit a child under the age of 18 years, to-wit: HNG (DOB: 09/02/1999), to be placed in a situation in which the child's life, body or health may be endangered, all in violation of K.S.A. 2011 Supp. 21-5601(b)(1). (Aggravated endangering a child, Level 9/Person/Felony)


Count 7

That on or about the 13th day of June, 2012, in Douglas County, Kansas, one Deborah Martha Gomez, did then and there unlawfully and feloniously and recklessly cause or permit a child under the age of 18 years, to-wit: JG (DOB: 07/24/1996), to be placed in a situation in which the child's life, body or health may be endangered, all in violation of K.S.A. 2011 Supp. 21-5601(b)(1). (Aggravated endangering a child, Level 9/Person/Felony)

Felony Penalty Section: K.S.A. 2011 Supp. 21-6804

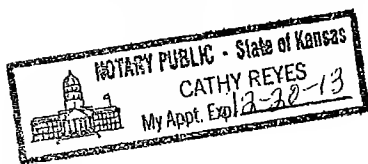
Witnesses:

OAG (DOB: 7/6/2004)
TJG (DOB: 6/26/2007)
FMG (DOB: 4/14/1998)
HNG (DOB: 9/2/1999)
JG (DOB: 7/24/1996)
Jon D Barta
Lindsay Bishop
Warren P Burket
Evidence Officer
Hayden Fowler
Randy S Glidewell
Nathaniel J Haig
James R Miller
Records Custodian
Charles J Stewart
Mark Alan Unruh
Lisa Wilcox



Amy McGowan, 12215
Assistant District Attorney

Subscribed and sworn to before me this 14th day of June, 2012.



Cathy Reyes

Notary Public
Term Expires: 12/20/2013

Probable Cause Arrest -- appearance bond requirement is ----- \$ _____

Notice: Information about the Diversion Program is available through the District Attorney's Office.